

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
ALABAMA, NORTHERN DIVISION

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MONICA PERRYMAN,
Plaintiff,

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2:06-cv-216-MHT-CSC

v.

DEBRA P. HARRIS, et al. Case No. 2:06-cv-mef

FIRST UNITED METHODIST CHURCH
and DARLENE MAYE,
Defendants.

U.S. DISTRICT COURT
MIDDLE DISTRICT ALA

AMENDED COMPLAINT

COMES NOW, the Plaintiff, Monica Perryman by and through her undersigned counsel and amend her complaint and thereby adopts by reference claims and facts filed in her original complaint to the extent they do not conflict with her new assertions and says as follows:

FACTS

1. Plaintiff, Monica Perryman, a black female, prior to her discharged was employed with First Untied Methodist Church for approximately four years. Ms. Perryman was employed as a Pre-K teacher. During the course of her employment Ms. Perryman had received excellent reviews during those years.
2. Sometime around September 2003, Ms. Perryman expressed her concerns on the following subjects:
 - a. The payroll checks being opened and read by the supervisor.
 - b. The safety of the children.
 - c. Her right for maternity leave.
 - d. Failure to pay her for time worked
3. Sometime around February 2005 plaintiff was refused time off while others were frequently given time off. Ms. Perryman was aware of several males who were frequently given time off and special favors.

Males were also given lighter work loads and were not required to perform the same tasks as Ms. Perryman.

4. The First Untied Methodist Church behavior was designed to harass, humiliate and frustrate Ms. Perryman in the performance of her duties as a Pre-K teacher in a deliberate and calculated attempt to remove her from her position. Ms. Perryman as a female employee was given excessive, burdensome, and unstable working conditions. While male employees, similarly situated were given stable working conditions and were allowed time off and received the same or higher pay as Ms. Perryman. The First Untied Methodist Church is also fostering a policy where female employees are more likely to be disciplined or terminated than male employees. The policy standard as imposed and enforced against female employees, is not the same policy standard that is enforced and imposed against male employees.
5. The First Untied Methodist Church has purposeful discriminated against Ms. Perryman. As a result of this discrimination the plaintiff has suffered embarrassment, humiliation, mental distress, emotional pain and anguish, and lost wages in violation of 13th and 14th Amendment of the Constitution of the United States, 42 U.S.C.A., 1981, 1983, 1985 and Equal Pay Act of 1963.

COUNT ONE

6. The Plaintiffs repeat, reallege and incorporate herein by reference the proceeding paragraphs as is set forth herein in full
7. Monica Perryman began her employment with the defendants approximately around August 2001.
8. The First Untied Methodist Church behavior was designed to harass, humiliate and frustrate Ms. Perryman in the performance of her

duties as a Pre-K teacher in a deliberate and calculated attempt to remove her from her position in violation of 13th and 14th Amendment of the Constitution of the United States, 42 U.S.C.A., 1981, 1983, .


COUNT TWO

9. The Plaintiffs, repeat, reallege, and incorporate herein by reference the proceeding paragraphs as is set forth herein in full.
10. The First United Methodist Church deprived Ms. Perryman, of her right for maternity leave and time off.
11. Ms. Perryman was deprived of her civil rights because of her gender in order to discriminate against her in application of policy concerns, work load, and unstable working conditions. While male employees, similarly situated were given stable working conditions in violation of 13th and 14th Amendment of the Constitution of the United States, 42 U.S.C.A., 1981, 1983, 1985 and Equal Pay Act of 1963.

COUNT THREE

12. The Plaintiff's repeat, reallege and incorporate herein by reference the proceeding paragraphs as is set forth herein in full.
13. The First United Methodist Church has purposeful discriminated against Ms. Perryman. As a result of this discrimination the plaintiff has suffered embarrassment, humiliation, mental distress, emotional pain and anguish, and lost wages in violation of 13th and 14th Amendment of the Constitution of the United States, 42 U.S.C.A., 1981, 1983, 1985 and Equal Pay Act of 1963.

THEREFORE, the above Plaintiff ask this honorable court for damages for said violations and any relief that this court might find appropriate.


Norman Hurst, (HUR016)
Attorney for the Plaintiff
462 Sayre Street
Montgomery, Alabama 36104
(334) 269-6449

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Complaint was served on the following by mailing copies of same by United States First Class Mail in a properly addressed envelope with adequate postage affixed thereon to assure delivery, addressed as follows:

Honorable R. Brett Garrett
184 Commerce Street
Montgomery, Alabama 36104

RESPECTFULLY SUBMITTED, this the 6th day of July 2006.


Norman Hurst